

NC 567 2x  
North Carolina Department of Environmental Quality

Pat McCrory  
Governor

Donald R. van der Vaart  
Secretary

October 15, 2015

Office of Environmental Analysis (OEA), Surface Transportation Board  
1925 K Street, NW  
Washington, DC 20423

Parker Poe Attorneys & Counselors at Law, Attn: Mr. Jeff Bandini  
PNC Plaza  
301 Fayetteville Street, Suite 1400  
Raleigh, NC 27601

Re: STB Docket No. AB-568 (Sub-No. 2X)

SOUTHEAST SHORTLINES, INC., d/b/a THERMAL BELT RAILWAY  
DISCONTINUANCE EXEMPTION IN RUTHERFORD COUNTY, NC

STB Docket No. AB-567 (Sub No. 2X)  
RUTHERFORD RAILROAD DEVELOPMENT CORPORATION  
-- ABANDONMENT EXEMPTION --  
IN RUTHERFORD COUNTY, NC

COMBINED ENVIRONMENTAL & HISTORIC REPORT OF  
SOUTHEAST SHORTLINES, INC.,  
d/b/a THERMAL BELT RAILWAY, and  
RUTHERFORD RAILROAD DEVELOPMENT CORPORATION

Dear Representative of Surface Transportation Board and Mr. Jeff Bandini:

I received the subject report and have reviewed it. Here, for the ease of readers of this letter, is the description of the project area taken from Page 6 of 8 of the subject report:

The rail line over which Thermal Belt Railway (TBRy), the lessee, proposes to discontinue service and Rutherford Railroad Development Corporation (RRDC), the lessor, proposes to abandon, runs between Milepost 175.5 near Alexander Mills (28043) and Milepost 180.47 in Spindale (28160), a distance of approximately 4.97 miles in Rutherford County, North Carolina. The majority of the line consists of a right-of-way 100 feet wide, more or less, and traverses the downtown area of the Town of Forest City, running parallel to Main Street. The area is characterized by a mix of uses developed over time, including residential, commercial, and industrial uses.

Here are my comments regarding the subject report:

1. Southeast Shortlines, Inc., d/b/a Thermal Belt Railway ("TBRy"), the lessee, and Rutherford Railroad Development Corporation ("RRDC"), the lessor, should please perform a Phase I Environmental Site Assessment on the property and submit the resulting report to me for review.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115

Phone: 704-663-1699 \ Internet: [www.ncdenr.gov](http://www.ncdenr.gov)

2. TBRY and RRDC have a duty to report any known environmental contamination.
3. TBRY and RRDC have a duty to investigate any suspected environmental contamination.

My experience with rail lines suggests that environmental contamination may result from the following common occurrences:

- Diesel fuel and pesticides have historically been applied for the suppression of vegetation along rail lines.
- Diesel fuel and products transported have historically been spilled during derailments.
- Chlorinated solvents may have leaked from tank cars as the rail lines in Rutherford County were originally constructed to serve the textile mills in the area.
- Spills have historically occurred when products have been loaded into rail cars or removed from them.

Also, there are two IHSB sites along this 4.97-mile stretch of rail line:

1. CONE MILLS - FLORENCE PLANT, NONCD0001107
2. WATTS REGULATOR-GENERAL AIDES SITE, NONCD0000060

The Superfund Section has moved to digitized storage of project files which are available to the public through an on-line portal called CARA/Documentum. Site files are located on the CARA/Documentum Storage system which can be accessed using the following instructions:

[http://portal.ncdenr.org/c/document\\_library/get\\_file?uuid=ad727cf9-9dd9-4658-83bc-cfbb488abd6f&groupId=38361](http://portal.ncdenr.org/c/document_library/get_file?uuid=ad727cf9-9dd9-4658-83bc-cfbb488abd6f&groupId=38361). By the way, there are seven records for ID contains NONCD0001107 in CARA/Documentum which may be directly accessed here: <https://edm.nc.gov/DENR-Portal/>. There are eight records for ID contains NONCD0000060 in CARA/Documentum.

The fact that the property will be redeveloped as a rail trail means that there will be an opportunity for people to have direct contact with any contaminants present. I do not intend for TBRY and RRDC to spend their money frivolously on ineffective environmental assessments. I do intend for TBRY and RRDC to investigate enough to ensure that human health and the environment are protected when the property is safely reused. To be clear, I am in favor of redeveloping the property as a rail trail. I just want for it to be done in a way that is protective of human health and the environment.

Please contact me with questions or comments at 704-235-2173 or [david.ramey@ncdenr.gov](mailto:david.ramey@ncdenr.gov).

Sincerely,



David Ramey, Hydrogeologist  
Division of Waste Management, NCDEQ

cc: Candice Andre, AICP, LEED GA, Senior Project Planner, vhb, 4000 WestChase Boulevard, Suite 530, Raleigh, NC 27607, 919-829-0328, [candre@vhb.com](mailto:candre@vhb.com)

ec: Collin Day, Environmental Supervisor II, IHSB Western Region  
Charlotte Jesneck, Branch Head, IHSB  
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